

EXHIBIT A

Proposed Limiting Instruction on Settlements

You are hearing testimony about settlements that certain defendants entered into with DEA. You may consider these settlements only to the extent you believe they bear on what notice or knowledge those defendants received as a result of the settlements. You may not infer or conclude that the allegations in the settlements were valid or accurate. You may not infer liability or draw any conclusions about a defendant's potential liability in this case based upon the fact that it entered into settlements. A company may enter into a settlement for many reasons having nothing to do with the truth of the allegations being made against it. For example, a company may enter into a settlement simply out of a desire for peace or to avoid the time or expense of a court case.